

IN THE UNITED STATES DISTRICT COURT

FOR THE

NORTHERN DISTRICT OF ILLINOIS

Mr. SHAWN GILBERT

Plaintiff,

vs

UNIVERSITY OF CHICAGO,
Lieutenant JAMES CURTIS individually

Defendants.

)
DOCKETED
)
SEP 12 2000
)

00C 5581

No.

JUDGE COAR

)
MAGISTRATE JUDGE BOBRICK
)
)
)

COMPLAINT

JURY TRIAL DEMANDED

FILED-CLERK
00 SEP 11 PM 11:39
U.S. DISTRICT COURT

The Plaintiff SHAWN GILBERT, by and through his ATTORNEYS HARRIS,
MITCHELL & DINIZULU, LLC, for his complaint states as follows:

NATURE OF THE CASE JURISDICTION

1. This is a civil action under 42 U.S.C. Section 1981 and 42 U.S.C. Section 1983 of the 14th Amendment of the United States Constitution and 28 U.S.C. Sections 1343, charging the Defendant with denial of equal protection of the law, deprivation of liberty and property interests and discrimination against Plaintiff in terms and conditions of employment based on race.
2. Plaintiff seeks to be changed to a different shift and compensatory damages for lost wages, including lost overtime and differential pay, lost career opportunities and such other affirmative relief as necessary to compensate the Plaintiff for the discriminatory actions of the defendant, which deprived

1-1

Plaintiff of his right to equal terms and conditions of employment and to a neutral work environment free of race discrimination and deprived the plaintiff of liberty and property without due process of the law.

3. Jurisdiction is conferred on the Court by 42 U.S.C. Section 1981 and 42 U.S.C. Section 1983, 28 U.S.C. 1343 and the 14th Amendment of the United States Constitution. Pendent jurisdiction is based upon the Illinois Human Rights Act for discrimination based on race discrimination entitling Plaintiff to monetary damages including punitive damages for intentional discrimination.

PARTIES

4. Plaintiff, SHAWN GILBERT, is a uniformed member of the University of Chicago Police Department, serving in the rank of Police Officer.
5. Plaintiff, SHAWN GILBERT, is an African American man who resides in the County of Cook, State of Illinois.
6. Defendant, UNIVERSITY OF CHICAGO is a private entity located in Cook County, State of Illinois.
7. Defendant, JAMES CURTIS, is the Lieutenant of the University of Chicago Police department and is sued individually and in his capacity as Lieutenant of the University of Chicago Police Department.
8. MR. GILBERT has complied with all the administrative prerequisites by filing a timely Charge of Discrimination based on race with the EEOC. A copy of the charge is attached hereto. See Exhibit "A"

9. On or about June 16, 2000, PLAINTIFF, MR. GILBERT received his Notice of Right to Sue from EEOC. See Exhibit "B"
10. This lawsuit arises out of the defendants' repeated acts of discrimination against the plaintiff based on race.

COMMON ALLEGATIONS

11. The plaintiff restates and realleges as though fully set forth herein paragraphs 1-10 of this complaint.
12. Plaintiff has been employed with the University of Chicago Police Department Since February 8, 1999
13. On or about November 16, 1999, plaintiff was subjected to different terms and conditions of employment than his white colleagues because of his race.
14. As a result of the Defendant's discriminatory treatment on or about November 16, 1999, the plaintiff was unfairly disciplined and suspended without pay.
15. A shift change is usually granted to requesting officers based on seniority.
16. The Plaintiff requested a shift change.
17. Officers with less seniority than the Plaintiff were granted shift changes.
18. Plaintiff requested a meeting with Associate Director to complain about race discrimination.
19. Defendant Curtis called Plaintiff a "boy" and told the plaintiff "You can't do nothing about it." ("it" was Defendant Curtis' overt discrimination against the Plaintiff).

20. Defendant Curtis verbally reprimanded the Plaintiff for wearing a “bike jacket.”
21. During that same period the Plaintiff’s white colleagues wore similar “bike jackets” and were not verbally reprimanded.
22. Plaintiff was terminated for not having a notebook at roll call.
23. Plaintiff’s white colleague did not have a notebook and disciplinary action was not taken against the Plaintiff’s white colleague.
24. Plaintiff’s termination was later reduced to a nine-day suspension.

CLAIMS FOR RELIEF

25. By reason of the aforesaid discriminatory conduct and the invidious practices and policies of discrimination, Defendants have denied Plaintiff his right to a neutral work environment, and has denied Plaintiff equal terms and conditions of employment, all in violation of 42 U.S.C. Section 1981 and 42 U.S.C. Section 19831, 28 U.S.C. 1343 and the 14th Amendment of the United States Constitution.
26. By reason of the aforesaid discriminatory conduct and the invidious practices and policies of discrimination, Defendants has violated the plaintiff’s rights under the Illinois Human Rights Act.
27. By these violations of law, Defendants have caused Plaintiff job-related damages for lost wages and lost career opportunities.
28. By these violations of law, Defendant has damaged the plaintiff’s good name and professional reputation and has caused the Plaintiff mental anguish.

PRAYER FOR RELIEF

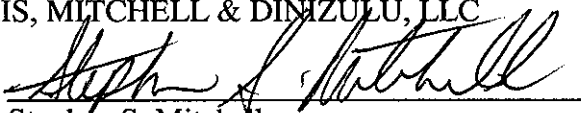
29. WHEREFORE, Plaintiff respectfully prays that this Court:
- A. Declare and adjudge the conduct of the Defendants to be violative of the Plaintiff's right to a neutral work environment and to constitute discrimination under 42 U.S.C. Section 1981 and 42 U.S.C. Section 19831, 28 U.S.C. 1343 and the 14th Amendment of the United States Constitution and the Illinois Human rights Act;
 - B. Declare and adjudge the Defendants' conduct deny to Plaintiff equal protection of the law;
 - C. Declare and adjudge the Defendants' conduct to violate Plaintiff's liberty and property rights protected by the 14th Amendment;
 - D. Award Plaintiff compensatory damages;
 - E. Award the plaintiff monetary damages under the Illinois Human rights Act for mental anguish caused by the defendant;
 - F. Change Plaintiff to a different shift;
 - G. Award Plaintiff reasonable costs and attorney's fees;
 - H. Grant such other and further relief as may be proper.

ATTORNEYS FOR PLAINTIFF

Dated September 11, 2000

HARRIS, MITCHELL & DINIZULU, LLC

By


Stephen S. Mitchell
Attorney for the Plaintiff

Harris, Mitchell & Dinizulu, LLC
Attorneys At Law
1753 E. 71st Street
Chicago, IL 60649
(773) 684-2800

CHARGE OF DISCRIMINATION		AGENCY <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	CHARGE NUMBER 210A02822
This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.			
Illinois Dept. of Human Rights <i>State or local Agency, if any</i>		and EEOC	
NAME (Indicate Mr., Ms., Mrs.) Mr. Shawn Gilbert		HOME TELEPHONE (Include Area Code) (773) 324-8086	
STREET ADDRESS 959 East 62nd, Chicago, IL 60637		CITY, STATE AND ZIP CODE DATE OF BIRTH	
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)			
NAME University Of Chicago		NUMBER OF EMPLOYEES, MEMBERS Cat D (501 +)	TELEPHONE (Include Area Code) (773) 702-8181
STREET ADDRESS 5855 Ellis, Chicago, IL 60637		CITY, STATE AND ZIP CODE COUNTY 031	
NAME		TELEPHONE NUMBER (Include Area Code)	
STREET ADDRESS		CITY, STATE AND ZIP CODE COUNTY	
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es)) <input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify)		DATE DISCRIMINATION TOOK PLACE EARLIEST LATEST 11/16/1999 04/21/2000 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):			
<p>I was hired by Respondent as a Police Officer on February 6, 1999. I have been subjected to different terms and conditions of my employment because of my race, in that I have been unfairly disciplined and suspended without pay on November 16, 1999. Respondent refuses to grant a change of shifts despite my seniority.</p> <p>I believe that I have been discriminated against because of my race, Black, in violation of Title VII of the Civil Rights Act of 1964, as amended.</p>			
EXHIBIT A			
<input type="checkbox"/> I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - (When necessary for State and Local Requirements)	
I declare under penalty of perjury that the foregoing is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
Date 21 Apr 2000 Charging Party (Signature) <i>Shawn Gilbert</i>		SIGNATURE OF COMPLAINANT	
		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Month, day and year)	

Equal Employment Opportunity Commission

DISMISSAL AND NOTICE OF RIGHTS

To: CERTIFIED MAIL NO.: Z-346-545-021 C/P

From:

Shawn Gilbert
959 East 62nd Street
Chicago, Illinois 60637

Equal Employment Opportunity Commission
Chicago District Office
500 West Madison Street, Suite 2800
Chicago, Illinois 60661-2511

☐ On behalf of a person aggrieved whose identity is
CONFIDENTIAL (29 CFR § 1601.7(a))

Charge No.

210A02822

EEOC Representative

Mr. Scott Sommers, Enforcement Supervisor

Telephone No.

(312) 886-9117

(See the additional information attached to this form.)

YOUR CHARGE IS DISMISSED FOR THE FOLLOWING REASON:

- ☐ The facts you allege fail to state a claim under any of the statutes enforced by the Commission
- ☐ Respondent employs less than the required number of employees.
- ☐ Your charge was not timely filed with the Commission, *i.e.*, you waited too long after the date(s) of the discrimination you alleged to file your charge. Because it was filed outside the time limit prescribed by law, the Commission cannot investigate your allegations.
- ☐ You failed to provide requested information, failed or refused to appear or to be available for necessary interviews/conferences, or otherwise refused to cooperate to the extent that the Commission has been unable to resolve your charge. You have had more than 30 days in which to respond to our final written request.
- ☐ The Commission has made reasonable efforts to locate you and has been unable to do so. You have had at least 30 days in which to respond to a notice sent to your last known address.
- ☐ The respondent has made a reasonable settlement offer which affords full relief for the harm you alleged. At least 30 days have expired since you received actual notice of this settlement offer.
- ☒ The Commission issues the following determination: Based upon the Commission's investigation, the Commission is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- ☐ Other (briefly state) _____

- NOTICE OF SUIT RIGHTS -

- ☒ **Title VII and/or the Americans with Disabilities Act:** This is your NOTICE OF RIGHT TO SUE, which terminates the Commission's processing of your charge. If you want to pursue your charge further, you have the right to sue the respondent(s) named in your charge in a court of competent jurisdiction. If you decide to sue, you must sue WITHIN 90 DAYS from your receipt of this Notice; otherwise your right to sue is lost.
- ☐ **Age discrimination in Employment Act:** This is your NOTICE OF DISMISSAL OR TERMINATION, which terminates processing of your charge. If you want to pursue your charge further, you have the right to sue the respondent(s) named in your charge in a court of competent jurisdiction. If you decide to sue, you must sue WITHIN 90 DAYS from your receipt of this Notice; otherwise your right to sue is lost.
- ☐ **Equal Pay Act (EPA):** EPA suits must be brought within 2 years (3 years for willful violations) of the alleged EPA underpayment.

6/13/00

On behalf of the Commission


John P. Rowe, District Director

Enclosures

Information Sheet
Copy of Charge

cc: Respondent(s) University of Chicago

EXHIBIT B

JS 44
(Rev. 12/96)

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, created at the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket. SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.

I. (a) PLAINTIFFS

GILBERT, SHAWN

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF COOK
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

HARRIS, MITCHELL & DINIZULU, LLC
1735 E. 71st STREET
CHICAGO, IL 60649
(773) 684-2800

DEFENDANTS

UNIVERSITY OF CHICAGO
Lieutenant James Curtis, individually

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT COOK
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, TRACT OF LAND INVOLVED

ATTORNEYS (IF KNOWN)

UNIVERSITY OF CHICAGO
OFFICE OF LEGAL COUNSEL
ARTHUR SUSSMAN
5801 S. Ellis Ave., Rm 503 Chicago, IL 60637

II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff
☒ 2 U.S. Government Defendant
☒ Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from another district (specify)
☐ 6 Multidistrict Litigation
☐ 7 Appeal to District Judge from Magistrate Judgment

V. NATURE OF SUIT

(PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 990 Other Statutory Actions
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609

VI. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, as amended

VII. REQUESTED IN COMPLAINT

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 ☐

DEMAND \$

CHECK YES only if demanded in complaint

JURY DEMAND: ☒ YES ☐ NOVIII. This case ☒ is not a refiling of a previously dismissed action.☐ is a refiling of case number _____, previously dismissed by Judge _____

DATE

9-11-00

SIGNATURE OF ATTORNEY OF RECORD

Steph [Signature]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

In the Matter of

SHAWN GILBERT

v.

UNIVERSITY OF CHICAGO

LIEUTENANT JAMES CURTIS, INDIVIDUALLY

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

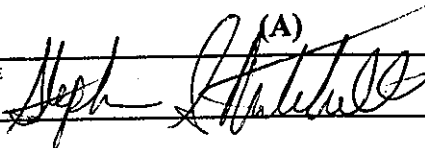
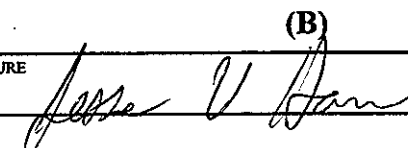
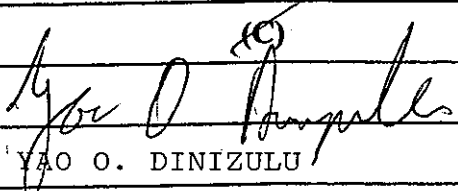
00C 5581
Case Number.

JUDGE COAR

MAGISTRATE JUDGE BOBRICK

PLAINTIFF, SHAWN GILBERT

DOCKETED
SEP 12 2000

<p>(A)</p> <p>SIGNATURE </p> <p>NAME STEPHEN S. MITCHELL</p> <p>FIRM HARRIS, MITCHELL & DINIZULU, LLC</p> <p>STREET ADDRESS 1735 E. 71st STREET</p> <p>CITY/STATE/ZIP CHICAGO, IL 60649</p> <p>TELEPHONE NUMBER (773) 684-2800</p> <p>IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6271346</p> <p>MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></p> <p>TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></p>	<p>(B)</p> <p>SIGNATURE </p> <p>NAME JESSE V. HARRIS</p> <p>FIRM HARRIS, MITCHELL & DINIZULU, LLC</p> <p>STREET ADDRESS 1735 E. 71st STREET</p> <p>CITY/STATE/ZIP CHICAGO, IL 60649</p> <p>TELEPHONE NUMBER (773) 684-2800</p> <p>IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6257082</p> <p>MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></p> <p>TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></p> <p>DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/></p>
<p>(C)</p> <p>SIGNATURE </p> <p>NAME YAO O. DINIZULU</p> <p>FIRM HARRIS, MITCHELL & DINIZULU, LLC</p> <p>STREET ADDRESS 1735 E. 71st STREET</p> <p>CITY/STATE/ZIP CHICAGO, IL 60649</p> <p>TELEPHONE NUMBER (773) 684-2800</p> <p>IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6242794</p> <p>MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></p> <p>TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></p> <p>DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/></p>	<p>(D)</p> <p>SIGNATURE</p> <p>NAME</p> <p>FIRM</p> <p>STREET ADDRESS</p> <p>CITY/STATE/ZIP</p> <p>TELEPHONE NUMBER</p> <p>IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)</p> <p>MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p>TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p>DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/></p>